



Louisville Metro Air Pollution Control District
701 West Ormsby Avenue, Suite 303
Louisville, Kentucky 40203-3137



Federally Enforceable District Origin Operating Permit (FEDOOP)

Permit No.: O-0004-19-F

Plant ID: 0004

Effective Date: 07/15/2019

Expiration Date: 07/31/2024

Permission is hereby given by the Louisville Metro Air Pollution Control District to operate the process(es) and equipment described herein which are located at:

Source: Smyrna Ready Mix Concrete, LLC 1561 East Washington St Louisville, KY 40206	Owner: Smyrna Ready Mix Concrete, LLC 1136 2 nd Avenue North Nashville, TN 37208
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The applicable procedures of District Regulation 2.17 regarding review by the U.S. EPA and public participation have been followed in the issuance of this permit. Based on review of the application on file with the District, permission is given to operate under the conditions stipulated herein. If a renewal permit is not issued prior to the expiration date, the owner or operator may continue to operate in accordance with the terms and conditions of this permit beyond the expiration date, provided that a complete renewal application is submitted to the District no earlier than twelve (12) months and no later than ninety (90) days prior to the expiration date.

Emission limitations to qualify for non-major status:

Pollutant: PM₁₀
Tons/year: 25

Application No.: See **Application and Related Documents** table.
Public Notice Date: 05/30/2019

Permit writer: Rick Williams

A handwritten signature in blue ink, appearing to read "Matt K.", is positioned above the title of the Air Pollution Control Officer.

Air Pollution Control Officer
7/15/2019

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FEDOOP Permit Revisions/Changes

Permit No.	Public Notice Date	Issue Date	Change Type	Description/Scope
27640-14-F	09/30/2014	11/20/2014	Initial	Original FEDOOP permit
O-0004-19-F	05/30/2019	07/15/2019	Renewal	Renewal of FEDOOP operating permit

Construction and Operating Permit Summary

Permit No.	Effective Date	Description
96-86-C ¹	06-01-1986	Cement silo #1, concrete batch plant #4
98-86-C ¹	06-01-1986	Cement silo #2, concrete batch plant #4
100-86-C ¹	06-01-1986	Cement silo #3, concrete batch plant #4
102-86-C ²	06-01-1986	Cement silo #1, concrete batch plant #6
104-86-C ²	06-01-1986	Cement silo #2, concrete batch plant #6
106-86-C ²	06-01-1986	Cement silo #3, concrete batch plant #6
306-97-O	11-19-1997	Concrete batch plant #6 in its entirety. Incorporates permits 102-86, 104-86, and 106-86
61-00-C	03/13/2000	C&W model RA200 baghouse for plant #4
169-00-C	07/26/2000	Paint spray booth
284-02-O	10-31-2002	Two parts washers and gun cleaner
27640-14-F	11/24/2014	FEDOOP initial issuance, combining individual equipment permits and setting emission limits

¹ Later combined into permit # 96-86-O, issued 09-30-1993. This permit was later revised to include current equipment description, points E1-E8

² Later combined into permit # 102-86-O, issued 09-30-1993. Later subsumed into permit # 306-97-O, with additional facilities.

Application and Related Documents

Document Number	Date Received	Description
96401	12/10/2018	Ownership and company name change application
96441	12/11/2018	Email to company requesting accelerated permit renewal application
96548	12/19/2018	Email transmittal of application documents
96552	12/19/2018	Email request for revised 100A form
96553	12/19/2018	Email receipt of revised 100A form

Abbreviations and Acronyms

AP-42	- AP-42, <i>Compilation of Air Pollutant Emission Factors, published by U.S.EPA</i>
APCD	- Louisville Metro Air Pollution Control District
BAC	- Benchmark Ambient Concentration
BACT	- Best Available Control Technology
Btu	- British thermal unit
CEMS	- Continuous Emission Monitoring System
CFR	- Code of Federal Regulations
CO	- Carbon monoxide
District	- Louisville Metro Air Pollution Control District
EA	- Environmental Acceptability
gal	- U.S. fluid gallons
GHG	- Greenhouse Gas
HAP	- Hazardous Air Pollutant
Hg	- Mercury
hr	- Hour
in.	- Inches
lbs	- Pounds
l	- Liter
LMAPCD	- Louisville Metro Air Pollution Control District
mmHg	- Millimeters of mercury column height
MM	- Million
NAICS	- North American Industry Classification System
NO _x	- Nitrogen oxides
PM	- Particulate Matter
PM ₁₀	- Particulate Matter less than 10 microns
PM _{2.5}	- Particulate Matter less than 2.5 microns
ppm	- parts per million
PSD	- Prevention of Significant Deterioration
psia	- Pounds per square inch absolute
QA	- Quality Assurance
RACT	- Reasonably Available Control Technology
SIC	- Standard Industrial Classification
SIP	- State Implementation Plan
SO ₂	- Sulfur dioxide
STAR	- Strategic Toxic Air Reduction
TAC	- Toxic Air Contaminant
UTM	- Universal Transverse Mercator
VOC	- Volatile Organic Compound
w.c.	- Water column
year	- Any period of twelve consecutive months, unless "calendar year" is specified
yr	- Year, or any 12 consecutive-month period, as determined by context

Preamble

This permit covers only the provisions of Kentucky Revised Statutes Chapter 77 Air Pollution Control, the regulations of the Louisville Metro Air Pollution Control District (District) and, where appropriate, certain federal regulations. The issuance of this permit does not exempt any owner or operator to whom it has been issued from prosecution on account of the emission or issuance of any air contaminant caused or permitted by such owner or operator in violation of any of the provisions of KRS 77 or District regulations. Any permit shall be considered invalid if timely payment of annual fees is not made. The permit contains general permit conditions and specific permit conditions. General conditions are applicable unless a more stringent requirement is specified elsewhere in the permit.

General Conditions

- G1. The owner or operator shall comply with all General Conditions herein and all terms and conditions in the referenced process/process equipment list.
- G2. All terms and conditions in this FEDOOP are enforceable by EPA, except those terms and conditions specified as District-only enforceable, and those which are not required pursuant to the Clean Air Act Amendments of 1990 (CAAA) or any of the Act's applicable requirements.
- G3. All application forms, reports, compliance certifications, and other relevant information submitted to the District shall be certified by a responsible official. If a change in the responsible official (RO) occurs during the term of this permit, or if an RO is added, the owner or operator shall provide written notification (Form AP-100A) to the District within 30 calendar days of such change or addition.
- G4. The owner or operator shall submit an annual compliance certification, signed by the responsible official, to the District, on or before April 15 of the year following the year for which the certification applies. This certification shall include completion of District Form 9440-O.
- G5. Periodic testing, instrumental monitoring, or non-instrumental monitoring, which may include record keeping, shall be performed to the extent necessary to yield reliable data for purposes of demonstrating continuing compliance with the terms and conditions of this permit.
- G6. The owner or operator shall retain all records required by the District or any applicable requirement, including all required monitoring data and supporting information, for a period of five years from the date of the monitoring, sampling, measurement, report, or application, unless a longer time period for record retention is required by the District or an applicable requirement. Records shall be retrievable within a reasonable time and made available to the District, Kentucky Division for Air Quality, or the EPA upon request.
- G7. The owner or operator shall provide written notification to the District, and receive approval, prior to making any changes to existing equipment or processes that would

result in emissions of any regulated pollutant in excess of the allowable emissions specified in this permit.

- G8. This permit may be reissued, revised, reopened, or revoked pursuant to District Regulation 2.17. Repeated violations of permit conditions are sufficient cause for revocation of this permit. The filing of a request by the owner or operator for any reissuance, revision, revocation, termination, or a notification of planned changes in equipment or processes, or anticipated noncompliance shall not alter any permit requirement.
- G9. Except as otherwise specified or limited herein, the owner or operator shall not allow or cause the emissions to equal or exceed either 10 tons per year, or such lesser quantity as the EPA has established by rule, of any one Hazardous Air Pollutant (HAP) or 25 tons per year of all HAPs combined. Fugitive HAP emissions shall be included in this limit. HAPs are listed in section 112(b) of the CAAA and as amended in 40 CFR 63, Subpart C.
- G10. Except as otherwise specified or limited herein, the owner or operator shall not allow or cause the emissions to equal or exceed 100 tons per year of any regulated pollutant, including particulate matter, PM₁₀, PM_{2.5}, sulfur dioxide, carbon monoxide, nitrogen oxides, lead, hydrogen sulfide, gaseous fluorides, total fluorides, or Volatile Organic Compounds (VOC); any pollutant subject to any standard in District Regulation 7.02; or any substance listed in sections 112(r), 602(a) and 602(b) of the CAAA. Fugitive emissions shall be included in these limits for source categories listed in District Regulation 2.16.
- G11. Unless specified elsewhere in this permit, the owner or operator shall complete required monthly record keeping within 30 days following the end of each calendar month.
- G12. Unless specified elsewhere in this permit, the owner or operator shall submit annual reports demonstrating compliance with the emission limitations specified. The report shall contain monthly and consecutive 12-month totals for each pollutant that has a federally enforceable limitation on the potential to emit. All reports shall include the company name, plant ID number, and the beginning and ending date of the reporting period. The compliance reports shall clearly identify any deviation from a permit requirement or a declaration that there were no such deviations. All annual compliance reports shall include the following per Regulation 2.17, section 3.5.
- A certification statement: "Based on information and belief formed after reasonable inquiry, I certify that the statements and information in this document are true, accurate, and complete", and
 - The signature and title of a responsible official of the company.

The report must be postmarked no later than March 1 of the year following the calendar year covered in the annual report.

G13. The owner or operator shall comply with all applicable requirements of the following federally enforceable District Regulations:

Regulation	Title
1.01	General Application of Regulations and Standards
1.02	Definitions
1.03	Abbreviations and Acronyms
1.04	Performance Tests
1.05	Compliance With Emissions Standards And Maintenance Requirements
1.06	Source Self-Monitoring, Emission Inventory Development and Reporting
1.07	Excess Emissions During Startups, Shutdowns, and Upset Conditions
1.08	Administrative Procedures
1.09	Prohibition of Air Pollution
1.10	Circumvention
1.11	Control of Open Burning
1.14	Control of Fugitive Particulate Emissions
1.18	Rule Effectiveness
1.19	Administrative Hearings
2.01	General Application (Permit Requirements)
2.02	Air Pollution Regulation Requirements and Exemptions
2.03	Authorization to Construct or Operate; Demolition/Renovation Notices and Permit Requirements
2.04	Construction or Modification of Major Sources in or Impacting Upon Non-Attainment Areas (Emission Offset Requirements)
2.05	Prevention of Significant Deterioration
2.06	Permit Requirements – Other Sources
2.07	Public Notification for Title V, PSD, and Other Offset Permits; SIP Revisions; and Use of Emission Reduction Credits
2.09	Causes for Permit Modification, Revocation, or Suspension
2.10	Stack Height Considerations
2.11	Air Quality Model Usage
3.01	Ambient Air Quality Standards
4.01	General Provisions for Emergency Episodes
4.02	Episode Criteria
4.03	General Abatement Requirements
4.04	Particulate and Sulfur Dioxide Reduction Requirements
4.05	Hydrocarbon and Nitrogen Oxides Reduction Requirements
4.06	Carbon Monoxide Reduction Requirements
4.07	Episode Reporting Requirements
6.01	General Provisions (Existing Affected Facilities)
6.02	Emission Monitoring for Existing Sources
7.01	General Provisions (New Affected Facilities)

- G14. The owner or operator shall comply with all applicable requirements of the following District-only enforceable regulations:

Regulation	Title
1.12	Control of Nuisances
1.13	Control of Objectionable Odors
2.08	Emission Fee, Permit Fees and Permit Renewal Procedures
2.17	Federally Enforceable District Origin Operating Permits
5.00	Definitions
5.01	General Provisions
5.02	Adoption and Incorporation by Reference of National Emission Standards for Hazardous Air Pollutants
5.14	Hazardous Air Pollutants and Source Categories
5.20	Methodology for Determining Benchmark Ambient Concentration of a Toxic Air Contaminant
5.21	Environmental Acceptability for Toxic Air Contaminants
5.22	Procedures for Determining the Maximum Ambient Concentration of a Toxic Air Contaminant
5.23	Categories of Toxic Air Contaminants
7.02	Adoption and Incorporation by Reference of Federal New Source Performance Standards

- G15. The owner or operator shall submit emission inventory reports, as required by Regulation 1.06, if so notified by the District.
- G16. The owner or operator shall submit timely reports of abnormal conditions or operational changes that may cause excess emissions, as required by Regulation 1.07.
- G17. Applications, reports, test data, monitoring data, compliance certifications, and any other document required by this permit shall be submitted to:

***Air Pollution Control District
701 W. Ormsby Avenue, Suite 303
Louisville, Kentucky 40203-3137***

Plantwide Requirements**Plantwide Applicable Regulations**

FEDERALLY ENFORCEABLE REGULATIONS		
Regulation	Title	Applicable Sections
2.17	Federally Enforceable District Origin Operating Permits	All
1.14	Control of Fugitive Particulate Emissions	1-6, 9

DISTRICT ONLY ENFORCEABLE REGULATIONS		
Regulation	Title	Applicable Sections
5.00 ³	Definitions	1.13.5

³ The company has requested permit conditions to be exempt from the STAR regulations, as allowed under Regulation 5.00, section 1.13.5. This regulation requires that emission of all regulated air pollutants is less than 25 tons per year.

Plantwide Specific Conditions

S1. Standards

[Regulation 2.17, section 5.1]

a. PM/PM₁₀

- i. The owner or operator shall not allow or cause total plantwide PM₁₀ emissions to equal or exceed 25 tons during any 12-consecutive month period.⁴ [Regulation 2.17, section 5.1]
- ii. The owner or operator shall not allow plantwide PM and PM₁₀ emissions to exceed 25 tons during any 12-consecutive month period.⁵ [Regulation 5.00, section 1.13.5.1]
- iii. The owner or operator shall not allow any materials to be handled, transported or stored; or access roads to and from the plant site, roads on the plant site property and the on-site work areas of the plant site, to be used without taking reasonable precautions to prevent particulate matter from becoming airborne beyond the work site, as specified in the Fugitive Dust Control Plan or other plan as approved by the District. [Reg. 1.14, section 2.1]

S2. Monitoring and Record Keeping

[Regulation 2.17, section 5.2]

The owner or operator shall maintain the following records for a minimum of 5 years and make the records readily available to the District upon request.

a. PM/PM₁₀

- i. The owner or operator shall, monthly, maintain records, including calculations, which show the total PM and PM₁₀ emissions during each month and 12-consecutive-month period using the calculation methodology described in Appendix A.

⁴ The source is potentially major for PM₁₀. The source accepted a limit of 25 tons per year for PM₁₀ as a FEDOOP limit.

⁵ The source has request exemption from the STAR regulations. This requires that PM/PM₁₀ emissions remain less than 25 tons per year.

S3. Reporting

[Regulation 2.17, section 5.2]

The owner or operator shall report the following information, as required by General Condition 12:

a. PM/PM₁₀

- i. The owner or operator shall report the plantwide total emissions for PM and PM₁₀ for each month and 12-consecutive-month period in the reporting period. These totals shall include PM and PM₁₀ emitted during control bypasses

Emission Unit U1: Concrete Batch Plant #4 (North)**U1 Applicable Regulations**

FEDERALLY ENFORCEABLE REGULATIONS		
Regulation	Title	Applicable Sections
1.14	Control of Fugitive Particulate Emissions	All
6.09	Standards of Performance for Existing Process Operations	1, 2, and 3

Equipment

Emission Point	Description	Install Date	Applicable Regulations	Control ID	Release ID
E1	Process cement silo #1	1972	6.09	C1	S1
E2	Process cement silo #2	1972		C1	S1
E3	Process flyash silo #3	1972		C1	S1
E5	Cement/flyash weigh hopper	1972		C1	S1
E6	Mixer loading	1972		C1	S1
E7	Cement storage silo	1972		C1	S1
E8	Flyash storage silo	1972		C1	S1
E4	Aggregate/sand weigh hopper	1972	1.14	None	Fugitive
E9	Aggregate stockpiles	1972		None	Fugitive
E10	Sand stockpiles	1972		None	Fugitive
E11	Aggregate/sand handling	1972		None	Fugitive
E12	Aggregate/sand transfer conveyor	1972		None	Fugitive
E13	Aggregate/sand bins	1972		None	Fugitive
E14	Roads & yard traffic	1972		None	Fugitive
E15	Two aggregate/sand bin loading conveyors	1972		None	Fugitive
E16	Two special aggregate bin loading conveyors	1972		None	Fugitive
E17	Two aggregate/sand conveyor loading hoppers	1972		None	Fugitive
E18	Two special aggregate conveyor loading hoppers	1972		None	Fugitive

Control Devices

Control ID	Description	Control Efficiency
C1	C&W Dust system, model RA200; 8000 cfm, installed 2000	98% ⁶

⁶ This is the APCD default efficiency without stack testing.

U1 Specific Conditions

S1. Standards

[Regulation 2.17, section 5.1]

a. Opacity

- i. The owner or operator shall not allow visible emissions to equal or exceed 20% opacity from any affected facility. [Reg. 6.09, section 3.1]

b. PM/PM₁₀

- i. See the requirements set forth in the Plantwide Conditions.
- ii. The owner or operator shall not allow PM emissions from E1, E2, or E3 to exceed 6.6 lb/hr each, based on actual operating hours in a calendar day. [Construction permit 61-00-C, effective date 3/31/2000]
- iii. The owner or operator shall not allow PM emissions from E1, E2, or E3 to exceed 6.9 tons/yr each. [Construction permit 61-00-C, effective date 3/31/2000]
- iv. The owner or operator shall not allow PM emissions to exceed the emission rate shown below, based on actual operating hours in a calendar day. [Regulation 6.09, section 3.2]

Emission Point	Maximum allowable PM, lb/hr	Emission Point	Maximum allowable PM, lb/hr
E1 *	35.1	E6 *	45.7
E2 *	35.1	E7 *	44.4
E3	15.5	E8	15.5
E5 *	45.7		

* These points cannot exceed the indicated emission rate uncontrolled.

- v. For emission points E1, E2, E3 and E8: The owner or operator shall operate and maintain the control device at all times an associated emission point is in operation, including periods of startup, shutdown, and malfunction, in a manner consistent with good air pollution control practice for minimizing emissions. [Regulation 1.05, section 5]

S2. Monitoring and Record Keeping

[Regulation 2.17, section 5.2]

The owner or operator shall maintain the following records for a minimum of five years and make the records readily available to the District upon request.

a. Opacity

- i. The owner or operator shall, monthly, conduct a 1-minute visible emissions survey, during normal operation, of every emission point. No more than four emission points shall be observed simultaneously. The opacity surveys can be performed on the building exhaust points if the process is inside an enclosure.
- ii. At emission points where visible emissions are observed, the owner or operator shall initiate corrective action within eight hours of the initial observation. If the visible emissions persist, the owner or operator shall perform or cause to be performed a Method 9 test, in accordance with 40 CFR 60, Appendix A within 24 hours of the initial observation.
- iii. The owner or operator shall maintain records, monthly, of the results of all visible emissions surveys and tests. Records of the results of any visible emissions survey shall include the date of the survey, the name of the person conducting the survey, whether or not visible emissions were observed, and what, if any, corrective action was performed. If an emission point is not being operated during a given month, then no visible emission survey needs to be performed and a negative declaration shall be entered in the record.

b. PM/PM₁₀

- i. See the requirements set forth in the Plantwide Conditions.
- ii. The owner or operator shall, monthly, perform a visual inspection of the structural and mechanical integrity of the process equipment for signs of damage, air leakage, corrosion, etc. and repair shall be performed as needed. The emissions points to be surveyed shall include, but not be limited to, the emission points listed below:
 - (1) Aggregate/sand bin loading conveyor fill hopper: E17, E18
 - (2) Aggregate/sand bin loading conveyor: E15, E16
 - (3) Aggregate/sand weigh hopper: E4
 - (4) Aggregate/sand transfer conveyor: E12
 - (5) Cement/flyash weigh hopper: E5
 - (6) Cement silo filling: E1, E2, E7

- (7) Flyash silo filling: E3, E8
 - (8) Central mixer loading: E6
- iii. The owner or operator shall, monthly, keep records of the visual inspection of the structural and mechanical integrity of the process equipment.
- iv. The owner or operator shall, monthly, calculate and maintain records of the monthly and 12-consecutive-month PM emissions from each emission point E1, E2, and E3, using the calculation methodology described in Appendix A.
- v. The owner or operator shall maintain daily records of any periods of time where the process was operating and the control device was not operating or a declaration that the control device operated at all times that day when the process was operating.
- vi. If there is any time that a control device is bypassed or not in operation when a connected process is operating, the owner or operator shall keep a record of the following for each bypass event:
 - (1) Date;
 - (2) Start time and stop time;
 - (3) Throughput at emission points E1, E2, E3, and E8 during the hours their respective controls are bypassed;⁷
 - (4) Identification of the control device and the uncontrolled emission point(s);
 - (5) PM emissions in lb/hr during the bypass;
 - (6) Summary of the cause or reason for each bypass event;
 - (7) Corrective action taken to minimize the extent or duration of the bypass event; and
 - (8) Measures implemented to prevent reoccurrence of the situation that resulted in the bypass event.

⁷ Emission points E1, E2, and E3 each have a ton-per-year emission limit from their respective construction permits that is lower than the limit established by Regulation 6.09 and which can be exceeded when operating uncontrolled. Emission points E3 and E8 can also exceed the Regulation 6.09 pound-per-hour limit when operating uncontrolled. Emission points E1, E2, and E3 also have lb/hr emission limit from their respective construction permits that is lower than the limit established by Regulation 6.09 and which can be exceeded when operating uncontrolled.

S3. Reporting

[Regulation 2.17, section 5.2]

The owner or operator shall report the following information, as required by General Condition 12:

a. Opacity

- i. The date, time and results of each visible emissions survey conducted that resulted in visible emissions being observed. If no visible emissions were observed during the reporting period, the owner or operator may submit a negative declaration.
- ii. The date, time and results of each Method 9 test conducted. If there were no Method 9 tests performed during the reporting, the owner or operator may submit a negative declaration.
- iii. Description of any corrective action taken for each exceedance of the opacity standard.

b. PM/PM₁₀

- i. See the requirements set forth in the Plantwide Conditions.
- ii. The owner or operator shall report the following regarding visual inspections:
 - (1) Emission unit and/or control device ID number;
 - (2) Identification of any repairs performed.
 - (3) Identification of any and all periods of failure to perform the monthly visual inspection of the structural and mechanical integrity checks.
- iii. The owner or operator shall report the following information regarding each control device bypass occurrence (or a declaration that no control device bypasses occurred) in the annual compliance reports:
 - (1) Emission point at which the by-pass occurred,
 - (2) Date and duration (including the start and stop time) during which a bypass occurred,
 - (3) The average pounds-per-hour of PM emitted at each emission point E1, E2, E3, or E8 during the bypass,
 - (4) Summary information on the cause or reason for the bypass activity,
 - (5) Corrective action taken to minimize the extent and duration of each bypass event,

- (6) Measures implemented to prevent reoccurrence of the situation that resulted in bypass emissions.
- iv. The owner or operator shall report any annual exceedance of established ton per year limits for E1, E2, or E3.

Emission Unit U2: Concrete Batch Plant #6 (South)**U2 Applicable Regulations**

FEDERALLY ENFORCEABLE REGULATIONS		
Regulation	Title	Applicable Sections
1.14	Control of Fugitive Particulate Emissions	All
6.09	Standards of Performance for Existing Process Operations	1, 2, and 3

Equipment

Emission Point	Description	Install Date	Applicable Regulations	Control ID	Release ID
E19	Process cement silo #1	1986	6.09 ⁸	C2	S2
E20	Process cement silo #2	1986		C2	S2
E21	Process fly ash silo #3	1986		C2	S2
E23	Cement/fly ash weigh hopper	1986		C2	S2
E24	Mixer loading	1986		C2	S2
E25	Cement storage silo	1986		C2	S2
E26	fly ash storage silo	1986		C2	S2
E22	Aggregate/sand weigh hopper	1986	1.14	None	Fugitive
E27	Aggregate stockpiles	1986		None	Fugitive
E28	Sand stockpiles	1986		None	Fugitive
E29	Aggregate/sand handling	1986		None	Fugitive
E30	Aggregate/sand transfer conveyor	1986		None	Fugitive
E31	Aggregate/sand bins	1986		None	Fugitive
E32	Roads & yard traffic	1986		None	Fugitive
E33	Two aggregate/sand bin loading conveyors	1986		None	Fugitive
E34	Two special aggregate bin loading conveyors	1986		None	Fugitive
E35	Two aggregate/sand conveyor loading hoppers	1986		None	Fugitive
E36	Two special aggregate conveyor loading hoppers	1986		None	Fugitive

Control Devices

Control ID	Description	Control Efficiency
C2	C&W Dust system, model RA200; 8000 cfm, installed 2000	98% ⁹

⁸ Plant #6 was relocated from an existing site on Jennings Lane, established in the 1960's. The regulation that was in effect at the time of original construction remains effective, rather than the one that was effective at the time of relocation (7.08).

⁹ This is the APCD default efficiency without stack testing.

U2 Specific Conditions

S1. Standards

[Regulation 2.17, section 5.1]

a. Opacity

- i. The owner or operator shall not allow visible emissions to equal or exceed 20% opacity. [Reg. 6.09, section 3.1]

b. PM/PM₁₀

- i. See the requirements set forth in the Plantwide Conditions.
- ii. The owner or operator shall not allow PM emissions from E19, E20, or E21 to exceed 32.5 lb/hr each, based on actual operating hours in a calendar day.
[Construction permit 102-86-C – 107-86-C, effective date 06/01/1986]
- iii. The owner or operator shall not allow PM emissions from E19, E20, or E21 to exceed 33.8 tons/yr each.
[Construction permit 102-86-C – 107-86-C, effective date 06/01/1986]
- iv. The owner or operator shall not allow PM emissions to exceed the emission rate shown below, based on actual operating hours in a calendar day. [Regulation 6.09, section 3.2]

Emission Point	Maximum allowable PM, lb/hr	Emission Point	Maximum allowable PM, lb/hr
E19 *	35.1	E24 *	45.7
E20*	35.1	E25*	44.4
E21	15.5	E26	15.5
E23 *	45.7		

* These points cannot exceed the indicated emission rate uncontrolled.

- v. For emission points E19, E20, E21 and E26: The owner or operator shall operate and maintain the control device at all times an associated emission point is in operation, including periods of startup, shutdown, and malfunction, in a manner consistent with good air pollution control practice for minimizing emissions. [Regulation 1.05, section 5]

S2. Monitoring and Record Keeping

[Regulation 2.17, section 5.2]

The owner or operator shall maintain the following records for a minimum of five years and make the records readily available to the District upon request.

a. Opacity

- i. The owner or operator shall, monthly, conduct a 1-minute visible emissions survey, during normal operation, of every emission point. No more than four emission points shall be observed simultaneously. The opacity surveys can be performed on the building exhaust points if the process is inside an enclosure.
- ii. At emission points where visible emissions are observed, the owner or operator shall initiate corrective action within eight hours of the initial observation. If the visible emissions persist, the owner or operator shall perform or cause to be performed a Method 9 test, in accordance with 40 CFR 60, Appendix A within 24 hours of the initial observation.
- iii. The owner or operator shall maintain records, monthly, of the results of all visible emissions surveys and tests. Records of the results of any visible emissions survey shall include the date of the survey, the name of the person conducting the survey, whether or not visible emissions were observed, and what, if any, corrective action was performed. If an emission point is not being operated during a given month, then no visible emission survey needs to be performed and a negative declaration shall be entered in the record.

b. PM/PM₁₀

- i. See the requirements set forth in the Plantwide Conditions.
- ii. The owner or operator shall, monthly, perform a visual inspection of the structural and mechanical integrity of the process equipment for signs of damage, air leakage, corrosion, etc. and repair shall be performed as needed. The emissions points to be surveyed shall include, but not be limited to, the emission points listed below:
 - (1) Aggregate/sand bin loading conveyor fill hopper: E35, E36
 - (2) Aggregate/sand bin loading conveyor: E33, E34
 - (3) Aggregate/sand weigh hopper: E22
 - (4) Aggregate/sand transfer conveyor: E30
 - (5) Cement/flyash weigh hopper: E23
 - (6) Cement silo filling: E19, E20, E25

- (7) Flyash silo filling: E21, E26
- (8) Central mixer loading: E24
- iii. The owner or operator shall, monthly, keep records of the visual inspection of the structural and mechanical integrity of the process equipment.
- iv. The owner or operator shall, monthly, calculate and maintain records of the monthly and 12-consecutive-month PM emissions from each emission point E19, E20, and E21, using the calculation methodology described in Appendix A.
- v. The owner or operator shall maintain daily records of any periods of time where the process was operating and the control device was not operating or a declaration that the control device operated at all times that day when the process was operating.
- vi. If there is any time that a control device is bypassed or not in operation when a connected process is operating, the owner or operator shall keep a record of the following for each bypass event:
 - (1) Date;
 - (2) Start time and stop time;
 - (3) Throughput at emission points E19, E20, E21, and E26 during the hours their respective controls are bypassed;¹⁰
 - (4) Identification of the control device and the uncontrolled emission point(s);
 - (5) PM emissions in lb/hr during the bypass for emission points E21 and E26;
 - (6) Summary of the cause or reason for each bypass event;
 - (7) Corrective action taken to minimize the extent or duration of the bypass event; and
 - (8) Measures implemented to prevent reoccurrence of the situation that resulted in the bypass event.

¹⁰ Emission points E19, E20, and E21 each have a ton-per-year emission limit from their respective construction permits that is lower than the limit established by Regulation 6.09 and which can be exceeded when operating uncontrolled. Emission points E21 and E26 can also exceed the Regulation 6.09 pound-per-hour limit when operating uncontrolled.

S3. Reporting

[Regulation 2.17, section 5.2]

The owner or operator shall report the following information, as required by General Condition 12:

a. Opacity

- i. The date, time and results of each visible emissions survey conducted that resulted in visible emissions being observed. If no visible emissions were observed during the reporting period, the owner or operator may submit a negative declaration.
- ii. The date, time and results of each Method 9 test conducted. If there were no Method 9 tests performed during the reporting, the owner or operator may submit a negative declaration.
- iii. Description of any corrective action taken for each exceedance of the opacity standard.

b. PM/PM₁₀

- i. See the requirements set forth in the Plantwide Conditions.
- ii. The owner or operator shall report the following regarding visual inspections:
 - (1) Emission unit and/or control device ID number;
 - (2) Identification of any repairs performed.
 - (3) Identification of any and all periods of failure to perform the monthly visual inspection of the structural and mechanical integrity checks.
- iii. The owner or operator shall report the following information regarding each control device bypass occurrence (or a declaration that no control device bypasses occurred) in the annual compliance reports:
 - (1) Emission point at which the by-pass occurred,
 - (2) Date and duration (including the start and stop time) during which a bypass occurred,
 - (3) The average pounds-per-hour of PM emitted at each emission point E21 or E26 during the bypass,
 - (4) Summary information on the cause or reason for the bypass activity,
 - (5) Corrective action taken to minimize the extent and duration of each bypass event,

- (6) Measures implemented to prevent reoccurrence of the situation that resulted in bypass emissions,
- iv. The owner or operator shall report any annual exceedance of established ton per year limits for E19, E20, or E21.

Emission Unit U3: Paint Refinish Shop**U3 Applicable Regulations**

FEDERALLY ENFORCEABLE REGULATIONS ¹¹		
Regulation	Title	Applicable Sections
7.79	Standards of Performance for New Commercial Motor Vehicle and Mobile Equipment Refinishing Operations	1, 2, 4

Equipment

Emission Point	Description	Install Date	Applicable Regulations	Control ID	Release ID
E37	Refinish shop	2000	7.79	C3	N/A

Control Devices

Control ID	Description	Control Efficiency
C3	Exhaust fan for paint area with pad filter	90%

¹¹ On January 5, 2011 Allied Ready Mix applied for an exemption from 40 CFR 63, subpart HHHHHH, as permitted in that regulation, because they do not use methylene chloride in paint stripping-operations and they do not use any surface coating-materials that contain the target HAPs.

U3 Specific Conditions

S1. Standards

[Regulation 2.17, section 5.1]

a. PM/PM₁₀

- i. See the requirements set forth in the Plantwide Conditions.
- ii. All spraying area exhaust shall pass through filters or a filtering system that has a minimum efficiency of 90% on particulates. Efficiency shall be verified by the manufacturer's rated efficiency or other means approved by the District. [Reg. 7.79, section 5.1.1]
- iii. Spraying equipment shall have a minimum transfer efficiency of 65% at eight inches from the work surface. [Regulation 7.79, section 5.2]
- iv. At all times, including periods of startup, shutdown, and malfunction, owners and operators shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. [Regulation 1.05, section 5]

b. VOC

- i. The owner or operator shall not allow or cause the VOC emissions, that are discharged into the atmosphere from the coating process, including all coatings, additives, catalysts, solvents, thinners, and cleaners from this process to exceed five tons per 12-consecutive-month period.
[Permit 169-00-C, effective 7/30/2000]
- ii. The owner or operator shall limit the VOC content in the coating materials as the following:
 - (1) For Group I vehicles and equipment: ¹²

Coating	VOC lb/gal	VOC kg/l
Pretreatment wash primer	6.5	0.78
Precoat	5.5	0.66
Primer/primer surfacer	4.8	0.58
Primer sealer	4.6	0.55
Topcoat	5.2	0.62
Metallic/iridescent topcoat	5.2	0.62
Extreme performance	6.2	0.74

¹² "Group I vehicles and equipment" means passenger cars, large- sized truck cabs and chassis, light and medium duty trucks and vans, motor homes, recreational vehicles and motorcycles. [Regulation 7.79, section 2.16]

- (2) For Group II vehicles: ¹³

Coating	VOC lb/gal	VOC kg/l
Pretreatment wash primer	6.5	0.78
Precoat	5.5	0.66
Primer/primer surfacer	2.8	0.34
Primer sealer	3.5	0.42
Topcoat	3.5	0.42
Metallic/iridescent topcoat	3.5	0.42
Extreme performance	6.2	0.74

- (3) The limitations of VOC content shall not be exceeded unless:
[Regulation 7.79, section 4.3]
- (a) Emissions are controlled to an equivalent level by air pollution control equipment,
 - (b) The efficiency of the control equipment is a minimum of 85%, and
 - (c) The control equipment has been approved by the District and permits issued.
- (4) Specialty coatings shall not be applied unless:
[Regulation 7.79, section 4.4]
- (a) The VOC content is equal to or less than 7.0 pounds of VOC per gallon of coating, as applied, and
 - (b) The application of all such coatings, except safety related coatings, shall not exceed 10% of all coatings applied, on a weekly basis.
- (5) Surface cleaners, consisting of general wiping cleaners, solvents, wax removers, grease removers, road-tar removers, mold-release agent removers, and other similar materials, must meet the following requirements: [Regulation 7.79, section 4.1.2]
- (6) General purpose surface cleaners shall have a VOC content that does not exceed 1.7 pounds per gallon.
[Regulation 7.79, section 4.2]
- iii. Spray gun cleanup shall be accomplished in an apparatus specifically designed to minimize evaporation of VOC materials to the atmosphere.
[Regulation 7.79, section 5.4]
 - iv. Spraying solvent through guns with no reasonable attempt to reclaim the used solvent is prohibited. [Regulation 7.79, section 6.3]

¹³ "Group II vehicles" means buses and mobile equipment. [Regulation 7.79, section 2.17]

- v. Good housekeeping practices shall be employed to minimize evaporation of solvent to the atmosphere. [Regulation 7.79, section 7]

S2. Monitoring and Record Keeping

[Regulation 2.17, section 5.2]

The owner or operator shall maintain the following records for a minimum of five years and make the records readily available to the District upon request.

a. Opacity

- i. The owner or operator shall, at least monthly, inspect the filters in the paint booth(s) to ensure proper installment (i.e. proper alignment/placement, gaps, etc.) and replace as needed.
- ii. The owner or operator shall keep a record that shows the date and the name of the person who inspected the filters and if filters were replaced.

b. PM/PM₁₀

- i. See the requirements set forth in the Plantwide Conditions.
- ii. The owner or operator shall, daily, maintain records of the hours where the paint booth was operating and the paint booth filters were not in place or a declaration that the paint booth filters were in place at all times that day when the process was operating.

c. VOC

- i. The owner or operator shall maintain the following records, at a minimum:
 - (1) A current list of all coatings, solvents, reducers, additives, and any other VOC containing material in use at the facility. This list shall include, but is not limited to, the following information:
 - (a) Name and appropriate identification of coating, catalyst, hardener, reducer, etc. used,
 - (b) Mix ratio of components used, and
 - (c) VOC content of coating, as applied, less water and excluded solvents, in pounds per gallon.
 - (2) Daily records that shall include:
 - (a) Identification of applied coatings, and
 - (b) Quantity of each coating applied.

- (3) Monthly records that shall include:
 - (a) Type of solvent used for cleanup or surface preparation, and
 - (b) Quantity of each solvent, cleaner, etc. used.
 - (4) MSDS/SDS or other data sheets provided by the material manufacturer or its agent for each item. This data shall include, at a minimum:
 - (a) Designation of VOC content as supplied, expressed in lbs/gal, less water and excluded solvents,
 - (b) Designation of all hazardous and/or toxic components. Designation shall include, as a minimum: the CAS registration number of the component; the weight percent of the component; and the weight of the product, expressed in lbs/gal, or alternately, the specific gravity of the product, and
 - (c) Other pertinent physical and chemical data necessary to determine compliance with District regulations.
- ii. The owner or operator shall, monthly, calculate and record the monthly and the 12-consecutive-month VOC emissions.

S3. Reporting

[Regulation 2.17, section 5.2]

The owner or operator shall report the following information, as required by General Condition 12:

a. Opacity

- i. The owner or operator shall report annually the filter corrective actions performed and filter replacement performed during the report period.

b. PM/PM₁₀

- i. See the requirements set forth in the Plantwide Conditions.
- ii. The owner or operator shall report the following information regarding each control device bypass occurrence (or a declaration that no control device bypasses occurred) in the annual compliance reports:
 - (1) Number of times the PM vent stream by-passed the paint booth filters and is vented to the atmosphere; and
 - (2) Duration of each by-pass to the atmosphere.

c. VOC

- i. The owner or operator shall report any use of materials not in compliance with the VOC content standards established for this emission unit.
- ii. The owner or operator shall report the total emissions for VOC for each month and 12-consecutive-month period in the reporting period.

Emission Unit IA1: Gasoline Dispensing**IA1 Applicable Regulations**

FEDERALLY ENFORCEABLE REGULATIONS		
Regulation	Title	Applicable Sections
7.15	Standards of Performance for Gasoline Transfer to New Service Station Storage Tanks (Stage 1 Vapor Recovery)	All
40 CFR 63 Subpart CCCCC	National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Dispensing Facilities	§§ 63.11111, 63.11115, 63.11116, 63.11126(b)

Equipment

Emission Point	Description	Install Date	Applicable Regulations	Control ID	Release ID
IA1-1	2000 gallon above-ground storage tank for gasoline	2002	7.15 40 CFR 63, subpart CCCCC	C4	N/A

Control Devices

Control ID	Description
C4	Stage 1 gasoline vapor recovery

IA1 Specific Conditions**S1. Standards**

[Regulation 2.17, section 5.1]

a. HAP

- i. The owner or operator must, at all times, operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether such operation and maintenance procedures are being used will be based on information available to the District which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source. [40 CFR 63.11115(a)]
- ii. The owner or operator of an affected source with a monthly throughput of less than 10,000 gallons, shall not allow gasoline to be handled in a manner that would result in vapor releases to the atmosphere for extended periods of time. Measures to be taken include, but are not limited to the following: [40 CFR 63.11116(a)]
 - (1) Minimize gasoline spills;
 - (2) Clean up spills as expeditiously as practicable;
 - (3) Cover all open gasoline containers and all gasoline storage tank fill-pipes with a gasketed seal when not in use;
 - (4) Minimize gasoline sent to open waste collection systems that collect and transport gasoline to reclamation and recycling devices, such as oil/water separators.

b. VOC

- i. The owner or operator of an affected facility (gasoline storage tank) shall install, maintain and operate the following devices on the storage tanks: [Reg. 7.15, section 3.1]
 - (1) Submerged fill pipe;
 - (2) If the gasoline storage tank is equipped with a separate gauge well, a gauge well drop tube shall be installed which extends to within six inches of the bottom of the tank;
 - (3) Vent line restrictions the affected facility; and
 - (4) Vapor balance system and vapor tight connections on the liquid fill and vapor return hoses. The cross-sectional area of the vapor return hose and any other vapor return passages in the circuit

connecting the vapor space in the service station tank to that of the truck tank must be at least 50% of the liquid fill hose cross-sectional area for each tank and free of flow restrictions to achieve acceptable recover. The vapor balance equipment must be maintained according to the manufacturer's specifications. The type, size and design of the vapor balance system are subject to the approval of the District.

- ii. The owner or operator may elect to use an alternate control system provided it can be demonstrated to the District's satisfaction to achieve an equivalent control efficiency. [Reg. 7.15, section 3.2]
- iii. The owner or operator shall not allow delivery of fuel to the storage tanks until the vapor balance system is properly connected to the transport vehicle and the affected facility. [Reg. 7.15, section 3.3]
- iv. No person shall deliver gasoline to a service station without connecting the vapor return hose between the tank of the delivery truck and the storage tank receiving the product. The vapor balance system must be operating in accordance with the manufacturer's specifications. [Reg. 7.15, section 3.4]
- v. Opening of a truck tank hatch for the purpose of visual inspection is permitted for a period not to exceed one minute and only after pumping from that compartment has stopped for at least three minutes prior to the opening. All truck tank hatches must be closed during pumping. [Reg. 7.15, section 3.5]
- vi. Except for above ground tank filling, all lines must be gravity drained in such a manner that upon disconnect no liquid spillage would be expected. [Reg. 7.15, section 3.6]
- vii. Above ground tanks shall be equipped with dry breaks with any liquid spillage upon the line disconnect not exceeding 10 ml (0.3 oz). [Reg. 7.15, section 3.7]
- viii. Equipment subject to this section shall be operated and maintained with no defects and: [Reg. 7.15, section 3.8]
 - (1) All fill tubes shall be equipped with vapor-tight covers including gaskets,
 - (2) All dry breaks shall have vapor-tight seals and shall be equipped with vapor-tight covers or dust covers,
 - (3) All vapor return passages shall be operated so there can be no obstruction of vapor passage from the storage tank back to the delivery vehicle,

- (4) All storage tank vapor return pipes and fill pipes without dry breaks shall be equipped with vapor-tight covers including gaskets,
- (5) All hoses, fittings, and couplings shall be in a vapor-tight condition.

S2. Monitoring and Record Keeping

[Regulation 2.17, section 5.2]

The owner or operator shall maintain the following records for a minimum of five years and make the records readily available to the District upon request.

a. HAP

- i. The occurrence and duration of each malfunction of operation or air pollution control and monitoring equipment.
- ii. Actions taken during periods of malfunction to minimize, including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation.

b. VOC

- i. There are no monitoring or record keeping requirements.

S3. Reporting

[Regulation 2.17, section 5.2]

The owner or operator shall report the following information, as required by General Condition 12:

a. HAP

- i. Each owner or operator of an affected source under this subpart shall report, by March 15 of each year, the number, duration, and a brief description of each type of malfunction which occurred during the previous calendar year and which caused or may have caused any applicable emission limitation to be exceeded. The report must also include a description of actions taken by an owner or operator during a malfunction of an affected source to minimize emissions, including actions taken to correct a malfunction. No report is necessary for a calendar year in which no malfunctions occurred. [40 CFR 63.11126(b)]

b. VOC

- i. There are no routine compliance reporting requirements.

Emission Unit IA2: Cold Solvent Parts Washers**IA2 Applicable Regulations**

FEDERALLY ENFORCEABLE REGULATIONS		
Regulation	Title	Applicable Sections
6.18	Standards of Performance for Solvent Metal Cleaning Equipment	1 - 4

Equipment

Emission Point	Description	Install Date	Applicable Regulations	Control ID	Release ID
IA2-1	Safety-Kleen cold solvent parts washer with 20 gallon secondary reservoir, model 250150	2001	6.18	N/A	fugitive
IA2-2	Safety-Kleen paint gun cleaner with 5 gallon secondary reservoir, model 1107R	2001	6.18	N/A	Fugitive

IA2 Specific Conditions

S1. Standards

[Regulation 2.17, section 5.1]

a. VOC

- i. The owner or operator shall install, maintain, and operate the control equipment as follows: [Regulation 6.18, section 4]
 - (1) The cold cleaner shall be equipped with a tightly fitting cover that is free of cracks, holes, or other defects. If the solvent is agitated or heated, then the cover shall be designed so that it can be easily operated with 1 hand. [Regulation 6.18, section 4.1.1]
 - (2) The cold cleaner shall be equipped with a drainage facility that is designed so that the solvent that drains off parts removed from the cleaner will return to the cold cleaner. The drainage facility may be external if the District determines that an internal type cannot fit into the cleaning system. [Regulation 6.18, section 4.1.2]
 - (3) A permanent, conspicuous label summarizing the operating requirements specified in section 4.2 shall be installed on or near the cold cleaner.
[Regulation 6.18, section 4.1.3]
 - (4) If used, the solvent spray shall be a fluid stream, not a fine, atomized, or shower type spray, at a pressure that does not cause excessive splashing. Flushing of parts using a flexible hose or other flushing device shall be performed only within the freeboard area of the cold cleaner. Solvent flow shall be directed downward to avoid turbulence at the air-solvent interface and to prevent solvent from splashing outside of the cold cleaner.
[Regulation 6.18, section 4.1.4]
 - (5) Work area fans shall be located and positioned so that they do not blow across the opening of the cold cleaner.
[Regulation 6.18, section 4.1.6]
 - (6) The solvent-containing portion of the cold cleaner shall be free of all liquid leaks. Auxiliary cold cleaner equipment such as pumps, water separators, steam traps, or distillation units shall not have any visible liquid leaks, visible tears, or cracks.
[Regulation 6.18, section 4.1.8]
- ii. The owner or operator shall observe at all times the following operating requirements: [Regulation 6.18, section 4.2]
 - (1) Waste solvent shall neither be disposed of nor transferred to another party in a manner such that more than 20% by weight of the waste solvent can evaporate. Waste solvent shall be stored only

in a covered container. A covered container may contain a device that allows pressure relief, but does not allow liquid solvent to drain from the container. [Regulation 6.18, section 4.2.1]

- (2) The solvent level in the cold cleaner shall not exceed the fill line. [Regulation 6.18, section 4.2.2]
- (3) The cold cleaner cover shall be closed whenever a part is not being handled in the cold cleaner. [Regulation 6.18, section 4.2.3]
- (4) Parts to be cleaned shall be racked or placed into the cold cleaner in a manner that will minimize drag-out losses. [Regulation 6.18, section 4.2.4]
- (5) Cleaned parts shall be drained for at least 15 seconds or until dripping ceases, whichever is longer. Parts having cavities or blind holes shall be tipped or rotated while the part is draining. During the draining, tipping, or rotating, the parts shall be positioned so that the solvent drains directly back to the cold cleaner. [Regulation 6.18, section 4.2.5]
- (6) A spill during solvent transfer shall be cleaned immediately, and the wipe rags or other sorbent material shall be immediately stored in a covered container for disposal or recycling, unless enclosed storage of these items is not allowed by fire protection authorities. [Regulation 6.18, section 4.2.6]
- (7) Sponges, fabric, wood, leather, paper products, and other absorbent material shall not be cleaned in a cold cleaner. [Regulation 6.18, section 4.2.7]

- iii. The owner or operator shall not operate a cold cleaner using a solvent with a vapor pressure that exceeds 1.0 mm_{Hg} (0.019 psi) measured at 20° C (68° F). [Regulation 6.18, section 4.3.2]

S2. Monitoring and Record Keeping

[Regulation 2.17, section 5.2]

The owner or operator shall maintain the following records for a minimum of five years and make the records readily available to the District upon request.

a. VOC

- i. The owner or operator shall maintain records that include the following for each purchase: [Regulation 6.18, section 4.4.2]
 - (1) The name and address of the solvent supplier,
 - (2) The date of the purchase,
 - (3) The type of the solvent, and

- (4) The vapor pressure of the solvent (in mm_{Hg}) at 20° C (68° F).

S3. Reporting

[Regulation 2.17, section 5.2]

The owner or operator shall report the following information, as required by General Condition 12:

a. VOC

- i. There are no routine compliance reporting requirements.

Emission Unit IA3: Water Heaters**IA3 Applicable Regulations**

FEDERALLY ENFORCEABLE REGULATIONS		
Regulation	Title	Applicable Sections
7.06	Standards of Performance for New Indirect Heat Exchangers	1 - 4

Equipment

Emission Point	Description	Install Date	Applicable Regulations	Control ID	Release ID
IA3-1	5.5 MMBtu/hr indirect natural gas-fired water heater	2008	7.06	N/A	S-H1
IA3-2	5.5 MMBtu/hr indirect natural gas-fired water heater	2008	7.06	N/A	S-H2

IA3 Specific Conditions

S1. Standards

[Regulation 2.17, section 5.1]

a. Opacity

- i. The owner or operator shall not cause to be discharged into the atmosphere from any affected facility particulate matter emissions which exhibit greater than 20% opacity. [Regulation 7.06, section 4.2]
- ii. The owner or operator shall not cause to be discharged into the atmosphere from any affected facility particulate matter emissions which exhibit greater than 20% opacity except: [Regulation 7.06, section 4.2]
 - (1) For indirect heat exchangers with a heat input capacity of less than 250 million BTU/hr, a maximum of 40% opacity shall be permissible for not more than two consecutive minutes in any 60 consecutive minutes;
 - (2) For indirect heat exchangers with heat input capacity of less than 250 million BTU/hr, a maximum of 40% opacity shall be permissible for not more than six consecutive minutes in any 60 consecutive minutes during cleaning the fire box or blowing soot; or
 - (3) For emissions from an indirect heat exchanger during building a new fire for the period required to bring the boiler up to operating conditions provided the method used is that recommended by the manufacturer and the time does not exceed the manufacturer's recommendations.

b. PM/PM₁₀

- i. See the requirements set forth in the Plantwide Conditions.
- ii. The owner or operator shall not cause to be discharged into the atmosphere from that affected facility particulate matter in excess of 0.56 pounds per million BTU actual total heat input.
[Regulation 7.06, section 4.1.4]

c. SO₂

- i. The owner or operator shall not cause to be discharged into the atmosphere from that affected facility any gases that contain sulfur dioxide in excess of 1.0 pounds per million BTU actual total heat input for combustion of liquid and gaseous fuels. [Regulation 7.06, section 5.1.1]

S2. Monitoring and Record Keeping

[Regulation 2.17, section 5.2]

The owner or operator shall maintain the following records for a minimum of five years and make the records readily available to the District upon request.

a. Opacity

- i. There are no routine compliance monitoring or record keeping requirements.¹⁴

b. PM/PM₁₀

- i. See the requirements set forth in the Plantwide Conditions.
- ii. There are no routine compliance monitoring or record keeping requirements in relation to Regulation 7.06.¹⁵

c. SO₂

- i. There are no routine compliance monitoring or record keeping requirements.¹⁵

S3. Reporting

[Regulation 2.17, section 5.2]

The owner or operator shall report the following information, as required by General Condition 12:

a. Opacity

- i. There are no routine compliance reporting requirements.

b. PM/PM₁₀

- i. See the requirements set forth in the Plantwide Conditions.
- ii. There are no routine compliance reporting requirements.

c. SO₂

- i. There are no routine compliance reporting requirements.

¹⁴ A determination has been made that a natural gas-fired boiler should inherently meet the opacity standard.

¹⁵ A one-time compliance demonstration using AP-42 emission factors has been performed for PM and SO₂ emissions. This demonstration showed that emission standards cannot be exceeded when combusting natural gas.

Off-Permit Documents

Allied Ready Mix has prepared a Fugitive Dust Control Plan that was incorporated in the previous FEDOOP operating permit, 27640-14-F. This document is no longer included as a permit appendix and is now maintained separately.

Insignificant Activities

Equipment	Qty.	PTE (tpy)	Regulation Basis
2000 gallon above-ground storage tank for gasoline (IA-1)	1	0.28 VOC	Regulation 1.02, section 1.38.1.2
Cold solvent parts washer with secondary reservoir (IA-2)	2	0.02 each VOC	Regulation 1.02, appendix A
Tanks for storage of lubricating oils or fuel oils, with vapor pressure less than 10 mm _{Hg} at conditions of 26°C and 760 mm _{Hg} . Includes 12,000 gallon diesel fuel tank.	5	1.38 VOC	Regulation 1.02, appendix A
Brazing, soldering, or welding equipment	3	1.23 PM	Regulation 1.02, appendix A
5.5 MMBtu/hr indirect natural gas-fired water heater (IA-3)	2	2.36 each NO _x	Regulation 1.02, Appendix A
< 1 MMBtu/hr indirect natural gas-fired unit heater	9	0.43 each NO _x	Regulation 1.02, appendix A

1. Insignificant activities identified in District Regulation 1.02, Appendix A, may be subject to size or production rate disclosure requirements.
2. Insignificant activities identified in District Regulation 1.02, Appendix A shall comply with generally applicable requirements.
3. The owner or operator shall annually submit an updated list of insignificant activities that occurred during the preceding year, with the compliance certification due April 15th.
4. Emissions from Insignificant Activities shall be reported in conjunction with the reporting of annual emissions of the facility as required by the District.
5. The owner or operator may elect to monitor actual throughputs for each of the insignificant activities and calculate actual annual emissions, or use Potential to Emit (PTE) as the annual emissions for each piece of equipment.
6. The District has determined that no monitoring, recordkeeping, or reporting requirements apply to the insignificant activities listed, except for the equipment that has an applicable regulation and permitted under an insignificant activity (IA) unit.

Appendix A - Calculation Methodology

Where appropriate, the emissions shall be calculated according to the following methodology or another method approved in writing by the District. Emissions are calculated by multiplying the throughput (ton, MMCF, gallons, etc.) or hours of operation of the equipment by the appropriate emission factor and take into account control devices, if applicable.

$$[Emission = throughput \times emission\ factor \times (1 - control\ efficiency)]$$

Where this is not an appropriate methodology, another method is shown.

In lieu of recording annual throughputs and calculating actual annual emissions, the owner or operator may elect to report the pollutant Potential To Emit (PTE) quantity listed in the Insignificant Activities table, as the annual emission for each piece of equipment that is designated as an IA.

Emission Point	Description	Emission Factor (lb/ton)			
		Uncontrolled		Controlled	
		PM	PM ₁₀	PM	PM ₁₀
E1	Process cement silo #1	0.73	0.47	0.00099	0.00034
E2	Process cement silo #2	0.73	0.47	0.00099	0.00034
E3	Process flyash silo #3	3.14	1.10	0.0089	0.0049
E4	Aggregate/sand weigh hopper	0.0048	0.0023	No controls	No controls
E5	Cement/flyash weigh hopper	0.0048	0.0028	9.6E-05	5.60E-05
E6	Mixer loading	0.572	0.156	0.0184	0.0055
E7	Cement storage silo	0.73	0.47	0.00099	0.00034
E8	Flyash storage silo	3.14	1.10	0.0089	0.0049
E12	Aggregate/sand transfer conveyor	0.0048	0.0023	No controls	No controls
E13	Aggregate/sand bins	0.0027	0.0013	No controls	No controls
E15	Two aggregate/sand bin loading conveyors	0.0048	0.0023	No controls	No controls
E16	Two special aggregate bin loading conveyors	0.0069	0.0033	No controls	No controls
E17	Two aggregate/sand conveyor loading hoppers	0.0027	0.0013	No controls	No controls
E18	Two special aggregate conveyor loading hoppers	0.0043	0.0020	No controls	No controls
E19	Process cement silo #1	0.73	0.47	0.00099	0.00034
E20	Process cement silo #2	0.73	0.47	0.00099	0.00034
E21	Process flyash silo #3	3.14	1.10	0.0089	0.0049
E22	Aggregate/sand weigh hopper	0.0048	0.0023	No controls	No controls
E23	Cement/flyash weigh hopper	0.0048	0.0028	9.6E-05	5.60E-05
E24	Mixer loading	0.572	0.156	0.0184	0.0055

Emission Point	Description	Emission Factor (lb/ton)			
		Uncontrolled		Controlled	
		PM	PM ₁₀	PM	PM ₁₀
E25	Cement storage silo	0.73	0.47	0.00099	0.00034
E26	Flyash storage silo	3.14	1.10	0.0089	0.0049
E30	Aggregate/sand transfer conveyor	0.0048	0.0023	No controls	No controls
E31	Aggregate/sand bins	0.0027	0.0013	No controls	No controls
E33	Two aggregate/sand bin loading conveyors	0.0048	0.0023	No controls	No controls
E34	Two special aggregate bin loading conveyors	0.0069	0.0033	No controls	No controls
E35	Two aggregate/sand conveyor loading hoppers	0.0027	0.0013	No controls	No controls
E36	Two special aggregate conveyor loading hoppers	0.0043	0.0020	No controls	No controls
E9	Aggregate stockpiles	0.0043	0.0020	lb/ton delivered	
		13.2	6.6	lb/day (pile erosion)	
E10	Sand stockpiles	0.00073	0.0013	lb/ton delivered	
		13.2	6.6	lb/day (pile erosion)	
E11	Aggregate/sand handling	0.858	0.172	lb/vehicle-mile	
E14	Roads & yard traffic	1.27*	0.25*	lb/vehicle-mile (unloaded truck)	
		2.05*	0.41*	lb/vehicle-mile (loaded truck)	
E27	Aggregate stockpiles	0.0043	0.0020	lb/ton delivered	
		13.2	6.6	lb/day (pile erosion)	
E28	Sand stockpiles	0.0043	0.0020	lb/ton delivered	
		13.2	6.6	lb/day (pile erosion)	
E29	Aggregate/sand handling	0.858	0.172	lb/vehicle-mile	
E32	Roads & yard traffic	1.27*	0.25*	lb/vehicle-mile (unloaded truck)	
		2.05*	0.41*	lb/vehicle-mile (loaded truck)	
		VOC lb/gal	Total HAP lb/gal	Uncontrolled PM=PM₁₀ lb/gal	Controlled** PM=PM₁₀ lb/gal
E37	Paint booth	Primer	4.36	1.76	1.97
		Basecoat	3.73	0.68	1.98
		Clearcoat	4.04	2.3	1.15
		Cleanup solvents	6.80	6.3	0.00

* This is for a dry roadway. If the roadway is wetted as required by the dust control plan a control factor of 70% may be applied.

** Based on a control efficiency of 90%, APCD default for panel filters.

Emissions for insignificant activities can be reported as the Potential to emit (PTE) shown here or calculated using the methodology shown below.

Insignificant Activities				
		VOC PTE ton/yr	PM PTE ton/yr	NOx PTE tons/yr
IA1	2000 gallon gasoline tank	0.28	---	---
IA2	Cold solvent parts washers	0.02	---	---
	Five tanks for lube and fuel oils, including 12,000 gal diesel fuel (total emissions)	1.38	---	---
	Maintenance welding	---	1.23	---
	Two indirect natural gas-fired water heaters (emissions each)	0.13	0.01	2.36
	Nine indirect natural gas-fired unit heaters (each)	0.02	0.002	0.43

Alternative calculation methodology:IA1 Gasoline tank:

$$VOC \left(\frac{ton}{yr} \right) = \left(\frac{throughput (gallons/year)}{1000} \right) \times EF \times \left(\frac{1 ton}{2000 lb} \right)$$

Where EF (lb/1000 gal) is

Storage tank filling	7.3
Tank breathing	1.0
Spillage	0.7
Vehicle filling	11.0

HAPS

Hexane	1.6% × VOC
Toluene	1.3% × VOC

IA2 Cold solvent parts washer:

EIIP Volume II, Chapter 8.4, Emission Model for Surface Evaporation, Equation 8.4-22

Lube and fuel oils

$$VOC \left(\frac{ton}{yr} \right) = \left(\frac{throughput (gallons/year)}{1000} \right) \times EF \times \left(\frac{1 ton}{2000 lb} \right)$$

Where EF (lb/1000 gal) is

Diesel fuel	0.05
All other oils	9.6

Maintenance Welding

$$PM/HAP \left(\frac{ton}{yr} \right) = \left(\frac{lb \text{ of electrode/year}}{1000} \right) \times EF \times \left(\frac{1 ton}{2000 lb} \right)$$

Where EF (lb/1000 lb) is

PM	17.4
Cr	0.39
Mn	1.45
Ni	0.19

Natural Gas combustion

$$Pollutant \left(\frac{ton}{yr} \right) = \left(\frac{gas combusted (cubic feet/year)}{1,000,000} \right) \times EF \times \left(\frac{1 ton}{2000 lb} \right)$$

Where EF (lb/mmcf) is

NO _x	100
CO	84
SO ₂	0.6
VOC	5.5
PM/PM ₁₀	0.52
Hexane	0.24

Fee Comment

The company is required to pay annual fees.